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7	Travelers Casualty Insurance Company of America	
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10	BB FILMS, a Nevada limited liability company,	CASE NO.: 2:23-cv-00109-APG-NJK
11	Plaintiff,	STIPULATION FOR EXTENSION OF
12	V.	TIME TO FILE ANSWER TO COMPLAINT
13	TRAVELERS CASUALTY INSURANCE	Second Request
14	COMPANY OF AMERICA, a foreign corporation doing business in the State of	
15	Nevada; DOES I through X; and ABC CORPORATIONS A-Z; inclusive,	
16	Defendants.	
17	Defendant Travelers Casualty Insurance Company of America ("Travelers") by and through	
18	their counsel, Clyde & Co US LLP, and Plaintiff, by and through their counsel, Leverty &	
19	Associates Law CHTD, submit this Stipulation to Extend the Time Within Which to Answer	
20	Plaintiffs' Complaint. The parties have stipulated to extend the response deadline to	
21	March 29, 2023.	
22	On February 16, 2023, the parties submitted their first request for extension of time to	
23	answer complaint setting forth that the parties were engaged in settlement discussions and wanted	
24	additional time to informally exchange documents and attempt to resolve the case without	
25	continued litigation costs. (ECF No. 13). The Court granted the request, and the deadline fo	
Tonding in Sunton Costs. (201 110. 15). The Court Stanted the request, and the deduction		are granted the request, and the detailine for

Travelers to answer the complaint was set for March 15, 2023. (ECF No. 14).

Since that time the parties have continued to exchange documents and present settlement demands. The parties are continuing to discuss settlement but are requesting an additional two (2) weeks due to personal matters that will require the parties to be unavailable during the week of March 13. Good cause exists to grant this request. The parties have suffered no prejudice from this request and are continuing to work towards a possible resolution and request additional time to attempt to resolve this matter without the need for the parties to incur any additional litigation costs, as those costs also factor into the settlement discussions. Accordingly, the parties respectfully request that this Court find that good cause exists relating to the filing of this stipulation and grant the parties' request to extend the deadline to respond to the Complaint to March 29, 2023. This is the second request by the parties to extend the time for Defendant to answer the Compliant. Dated: March 10, 2023 LEVERTY & ASSOCIATES LAW CHTD CLYDE & CO US LLP /s/ Patrick R. Leverty /s/ Dylan P. Todd Amy M. Samberg (NV Bar No. 10212) Patrick R. Leverty, Esq., NV Bar No. 8840 amy.samberg@clydeco.us Vernon E. Leverty, Esq., NV Bar No. 1266 Dylan P. Todd (NV Bar No. 10456) William R. Ginn, Esq., NV Bar No. 6989 dylan.todd@cyldeco.us 3100 W Charleston Blvd., Suite 200 7251 W. Lake Mead Blvd., Suite 430 Las Vegas, NV 89102 Las Vegas NV 89128 Ph. (702) 507-0201 Telephone: 725-248-2900 Facsimile: 725-248-2907 Attorneys for Plaintiff Attorneys for Defendant Travelers Casualty Insurance Company of America

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IT IS SO ORDERED. Dated: March 13, 2023

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Nancy J. Koppe

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United States Magistrate Judge

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